

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

<b>LINDY G. WRIGHT,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>Civil Action No. 3:06-CV-1087-WKW</b>
<b>v.</b>	)	
	)	
<b>CHATTAHOOCHEE VALLEY COMMUNITY COLLEGE (CVCC), <i>et al.</i>,</b>	)	
	)	
<b>Defendants.</b>	)	

**PROPOSED DISCOVERY PLAN**

1. In accord with *Federal Rules of Civil Procedure* 26(f), the parties have agreed to the following Proposed Discovery Plan. The agreement was reached by and between the following attorneys:

Peter A. Dumbuya for the Plaintiff;  
Jennifer B. Cooley for the Plaintiff;  
Joan Yvette Davis for Defendants Chattahoochee Valley Community College, Dr. Laurel Blackwell, Dr. James Lowe and Dr. Dixie Peterson; and  
H. E. Nix, Jr., for Defendants Chattahoochee Valley Community College, Dr. Laurel Blackwell, Dr. James Lowe and Dr. Dixie Peterson.

2. **Pre-Discovery Disclosures:** The parties shall exchange the information required by *Federal Rules of Civil Procedure* 26(a)(1) within forty-two (42) days of the Court's Scheduling Conference Order.

3. **Discovery Plan:** The parties jointly propose to the Court the following Discovery Plan: Discovery will be needed on questions of liability, defenses, injuries, damages and other requested remedies.

Discovery shall be completed by October 1, 2007.

Maximum of 45 interrogatories by each party to any other party. [Responses due 30

days after service.]

Maximum of 45 requests for production by each party to any other party.

[Responses due 30 days after service.]

Maximum of 15 requests for admissions by each party to any other party.

[Responses due 30 days after service.]

Maximum of 10 depositions by Plaintiff and 10 for Defendants.

Each deposition, other than that of named parties, is limited to a maximum of five hours unless extended by agreement of the parties. Each deposition of the named parties is limited to eight hours, unless modified by agreement of the parties.

Reports and complete *curriculum vitae* from experts expected to be used at trial under Rule 26(a)(2) due from Plaintiff by May 1, 2007, and from Defendants by June 15, 2007. Each party shall make all such experts available for deposition no later than six weeks from disclosure.

4. **Other Items:**

The parties do not request a conference with the Court before entry of the Scheduling/Discovery Order.

The parties request a Pre-Trial Conference after December 31, 2007, with sufficient time for the Court to consider dispositive motions filed by October 15, 2007.

Plaintiff should be allowed until March 1, 2007 to join additional parties and until April 1, 2007 to amend the pleadings.

Defendants should be allowed until April 15, 2007 to join additional parties and until June 15, 2007 to amend the pleadings.

All potential dispositive motions should be filed within 90 days before the Pre-Trial Conference.

Final lists of witnesses Under Rule 26(a)(3) should be due from all parties six weeks before the Pre-Trial Conference and the parties may seek leave of Court to depose any witness previously identified.

Final lists of exhibits under Rule 26(a) (3) should be due from the parties six weeks before the trial date and all such exhibits shall be made available to opposing counsel immediately upon request.

Parties should have 14 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

The case should be ready for trial following resolution of any dispositive motions, and is expected to take four days to try.

Respectfully submitted this the 22<sup>nd</sup> day of January, 2007.

/s/ H. E. Nix, Jr.

H. E. Nix, Jr. (NIX007)

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/s/ Joan Yvette Davis

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